

MEMORANDUM

SUBJECT: Request for OMB Approval for Compliance Assistance Program Evaluation Survey:
Pilot Generic ICR, (OMB Control No. 1860.01)

FROM: John Mason
Office of Compliance
Office of Enforcement and Compliance Assurance

TO: Lynn Johnson, OECA Desk Officer
Regulatory Information Division
Office of Policy

In early 1998, the Office of Compliance Assurance and Enforcement sent EPCRA Section 312 compliance materials to industrial organic manufacturing and telecommunications facilities aimed at achieving full compliance with reporting requirements of EPCRA Section 312. In order for the Regions to evaluate whether these compliance materials were successful in providing useful information and promoted compliance within the regulated industry, we have prepared the attached “EPCRA 312 Compliance Assistance Evaluation Survey” survey form. The survey is strictly voluntary and seeks the opinions of persons who received the compliance materials.

Approximately 2500 copies of the survey will be distributed to the facilities that received the compliance materials. We expect a 5% return rate or about 125 surveys.

If you have any questions regarding this request, please contact me at (202) 564-7037.

Attachments

cc: Regional EPCRA 312 Coordinators

Request for Approval of Information Collection Activity

A. Background:

The Environmental Protection Agency (EPA) is required under Government Performance and Results Act (GPRA) to measure the effectiveness of its activities including compliance assistance activities. A major component of the Office of Enforcement and Compliance Assurance (OECA) is to assist the regulated community in understanding and fulfilling their regulatory requirements. One approach used by OECA is to provide assistance on an industrial sector basis. OECA would like to receive feedback on the effectiveness of its EPCRA Section 312 industrial organic and telecommunications compliance assistance materials by evaluating their usefulness in providing guidance to these regulated entities to meet their reporting requirements in accordance with EPCRA Section 312. OECA is also interested in learning whether the compliance materials encouraged businesses and organizations to make any operational or organizational changes to facilitate compliance.

B. Survey Purpose:

The purpose of the survey is to obtain feedback from recipients of the EPCRA 312 compliance materials as to whether these documents helped the user understand EPCRA requirements and whether it prompted them to report under EPCRA.

C. Survey Methodology and Use of Results:

The potential audience for the survey is the approximate 2500 recipients of the EPCRA 312 compliance materials. We anticipate that approximately 5% or 125 users will respond. We estimate that it will take a respondent approximately 10 minutes to complete the survey form.

Depending on the number of responses, OECA will create a spreadsheet or a small database to compile and analyze the responses. We will prepare a brief report for internal planning purposes and for program reporting. The data will also be used to assist us in the development of other similar compliance assistance materials.

D. Respondents' Burden:

Number of Respondents	125
Minutes per Response	10 minutes x 125 = 1250 minutes or 20.8 hours
Cost per Hour	\$33.00*
Total Burden	for 20.8 hours = \$687.50

* Based on Bureau of Labor Statistics "Employer Costs for Employment Compensation".

E. Agency Burden:

EPA Staff Time:	40 hours
Cost per Hour:	\$34.98**
Total Burden:	\$1399.20

** This rate is based on a 1998 GS-13/01 salary of \$55,969 or \$26.91 per hour with 30% overhead. The hourly rate is therefore \$34.98 for this estimate.

DRAFT SURVEY

We would like to know whether the EPCRA 312 compliance materials provided useful information. This information will be used by EPA to measure the success of this tool in providing compliance assistance and to determine future applications and needs for regulatory checklists and auditing materials.

1. Overall, did you find the compliance materials helpful for understanding EPCRA reporting requirements? Yes ____ No ____
2. How would you rate the usefulness of the compliance materials?
Low Medium High
3. Did the compliance materials help you determine whether you were subject to EPCRA reporting requirements? Am subject to EPCRA ____ Am not subject to EPCRA ____
4. Did you make any changes in your environmental practices or otherwise take action to comply with EPCRA requirements as a result of the compliance materials? Yes ____
No ____
5. To comply with EPCRA reporting requirements, has your facility filed a Tier I, II or form R?
Yes ____ No ____ Not yet, but we are planning on doing so ____
6. What additional actions do you intend to take as a result of using the materials? Please check all that apply.

 - 9 Contact a regulatory agency
 - 9 Contact a compliance assistance provider (e.g., trade association, state agency, EPA)
 - 9 Disclose violations discovered during the audit under EPA's Audit Policy
 - 9 Disclose violations discovered under EPA's Small Business Policy
 - 9 Change a process or practice
 - 9 Implement or improve pollution prevention practices (e.g., source reduction, recycling)
 - 9 Other _____
 - 9 No actions or organizational changes are likely to result from the use of this document.
7. In order to understand your response we, would like to know what function you perform with respect to environmental compliance. _____

8. How many employees are located at your facility (including full time contractors)?
9 0-9 9 10-49 9 50-100 9 101-500 9 More than 500